

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NANCY ROSARIO, INDIVIDUALLY, AS)
SHE IS THE ADMINISTRATRIX OF THE)
ESTATE OF AWILDA SANTIAGO, ESSEX)
PROBATE COURT DOCKET #03P-2499AD1,)
P/P/A VERONICA ROSARIO AND)
CHRISTINA SANTIAGO, AND AS)
SHE IS THE ADMINISTRATRIX OF THE)
ESTATE OF JOSE SANTIAGO, BERLIN)
(CONNECTICUT))
PROBATE COURT, CASE #03-0713)
Plaintiff)

Civil Action #05-CV-10617MLW

v.)

RARE HOSPITALITY INTERNATIONAL, INC.)
d/b/a LONGHORN STEAKHOUSE)
Defendant)

**PLAINTIFF'S OBJECTION TO MOTION FOR PROTECTIVE ORDER OF RARE
HOSPITALITY INTERNATIONAL, INC.**

Plaintiff hereby opposes RARE's Motion For Protective Order because the work product doctrine, relied upon by RARE, was never meant to insulate the type of improper conduct engaged in here by John DiNatale, RARE's private investigator, who, the record compels, sought out, met with and purposely misled Jude Connelly, a critical liability witness on key issues in this case shortly before his deposition. The motion for a protective order should be denied, and RARE's private investigator should be ordered to fully testify about his conversations and interactions with Mr. Connelly and other fact witnesses.

In support of this opposition, plaintiff submits herewith her memorandum in opposition and the Affidavit of Albert L. Farrah, Jr.

REQUEST FOR ORAL ARGUMENT

Plaintiff hereby requests oral argument on the Motion for Protective Order.

Plaintiff
By her attorney,



ALBERT L. FARRAH, JR., ESQ.
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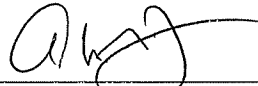
Date: August 15, 2006

CERTIFICATE OF SERVICE

SUFFOLK, SS

August 15, 2006

A copy of the Plaintiff's Opposition to Motion for Protective Order of RARE Hospitality International, Inc. was today emailed and mailed, postage prepaid, to Michael Gillis, Esq., Gillis & Bikofsky, P.C., 1150 Walnut Street, Newton Highlands, MA 02461.



Albert L. Farrah, Jr., Esq.